

**MEMO ENDORSED**

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February 22, 2021

Hon. Valerie E. Caproni  
United State District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Salifou Conde  
19 Cr. 808 (VEC)

Hon. Valerie E. Caproni:

I am counsel for Salifou Conde, who requests temporary modification of his conditions of pretrial release to permit travel in Guinea, West Africa. By Order dated January 13, 2021, Your Honor denied Mr. Conde's previous application to travel to Guinea to visit his mother. (Dkt. 159).

The purpose of Mr. Conde's new proposed trip is to help settle the estate of his father, Sekou Conde, who passed away on July 11, 2020. Sekou Conde had a total of eighteen children with four wives. His will is in probate in Guinea, and much of the property is in the names of various children, including Salifou Conde, the defendant. Nsira Toure, the mother of Salifou Conde, is making an urgent appeal for him to return to Guinea to participate in the probate proceedings. Mr. Conde is concerned that his family will be unnecessarily divided if he fails to appear to help reach an amicable settlement of the estate.

If given permission to travel, Mr. Conde would depart from JFK Airport on February 29, 2021, and he would return on March 25, 2021. While in Guinea, he would stay in Nongo.

This Court permitted temporary modification of Mr. Conde's travel restrictions on one prior occasion. Between March 7, 2020 and March 17, 2020, Mr. Conde was permitted to travel to Guinea, West Africa, to visit his dying father. (Dkt. 70, p. 4-8). During oral argument on that application, the Court noted that Mr. Conde is released on a \$100,000 personal recognizance bond signed by three family members, including his wife who lives with him in the United States. Mr. Conde is a United States citizen, and he also has a passport for Guinea. For that trip,

Mr. Conde was required to surrender to Pretrial Services the United States passports of his two children, as a precondition to the Government releasing his passport to him. Within 48 hours of his return, Mr. Conde was required to surrender his passport to Pretrial Services. Mr. Conde proved that he was trustworthy to return to court by fully complying with the Court's order during that trip.

Assistant United States Attorney Kedar Bhatia informs me that he objects to this application. United States Pretrial Services Officer Kristen McKeown, who supervises Mr. Conde in the District of New Jersey, informs me that Pretrial defers to the Government on this issue.

Sincerely,

/s/

Donald J. Yannella, Esq.

c. AUSA Kedar Bhatia  
Pretrial Services Officer Kristen McKeown

Application DENIED. In addition to the risks associated with international travel due to the COVID-19 pandemic, Mr. Conde fails to provide adequate reasons for why he would need to be physically present in Guinea in order to assist his mother with the probate proceedings.

SO ORDERED.



2/22/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE